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**From:** Hence, Kia [hence.kia@epa.gov]  
**Sent:** 5/4/2017 1:35:16 PM  
**To:** david.krask@maryland.gov  
**CC:** Joel Dreessen -MDE- [joel.dreessen@maryland.gov]; Michael Woodman -MDE- [Michael.woodman@maryland.gov]; Jennifer Hains [jennifer.hains@maryland.gov]; Chow, Alice [chow.alice@epa.gov]  
**Subject:** FW: Exception Event

Hi Dave,

I emailed OAQPS and got the following response. Let me know if you have any more questions☺

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**From:** Gibson, Benjamin  
**Sent:** Thursday, May 04, 2017 9:31 AM  
**To:** Hence, Kia <hence.kia@epa.gov>  
**Cc:** Hyden, Loretta <Hyden.Loretta@epa.gov>; Palma, Elizabeth <Palma.Elizabeth@epa.gov>; Casso, Ruben <Casso.Ruben@epa.gov>  
**Subject:** RE: Exception Event

Kia,

Tim Sharac (CAMD) was involved in the 2016 Exceptional Events Rule development process, particularly on the CASTNET issue. So, he is correct, the state can ask CAMD (as the owner of the CASTNET monitors) to flag the data. We address this issue in the EER preamble. (As a side note, CAMD technically could also develop the demo, but MD and CAMD would need to work that out. Since other MD monitors are involved, the easiest approach is for the state to develop the demo as they are doing. Just wanted to point this out as an FYI.)

From a process standpoint, here's what should happen...

1. MD sends CAMD a letter/email (similar to the one that you forwarded) requesting that CAMD flag the indicated data
2. CAMD flags indicated data (and sends MD an email indicating that they have done this)
3. MD develops the demo to include all (claimed) event-influenced monitors, CASTNET included (analyses should be the same for CASTNET as for any other state-owned/operated monitor)
4. In the narrative part of the demo discussing the CASTNET monitors, MD should include a couple of sentences indicating that they requested that the data be flagged and CAMD responded. MD should also include as an appendix to their demo, copies of the correspondence b/t the state and CAMD, including the flagging request letter and any correspondence back from CAMD. (Note: CAMD should NOT send MD a letter indicating that they concur with the demo – it is not CAMD's job to concur with the request or to otherwise comment on the merits of the flagging. They should note that they are flagging the indicated data at the state's request)
5. MD submits demo and R3 reviews – follow the normal process...

Just let me know if you have follow-up questions.

Ben

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**From:** Hence, Kia  
**Sent:** Thursday, May 04, 2017 7:21 AM  
**To:** Gibson, Benjamin <gibson.benjamin@epa.gov>; Palma, Elizabeth <Palma.Elizabeth@epa.gov>  
**Cc:** Hyden, Loretta <Hyden.Loretta@epa.gov>  
**Subject:** FW: Exception Event

Maryland wants to include CASTNET monitors in their request for data exclusion. How do we handle CASTNET in demos? Please see their email below.

**From:** David Krask -MDE- [<mailto:david.krask@maryland.gov>]  
**Sent:** Thursday, May 04, 2017 6:08 AM  
**To:** Hence, Kia <[hence.kia@epa.gov](mailto:hence.kia@epa.gov)>; Hyden, Loretta <[Hyden.Loretta@epa.gov](mailto:Hyden.Loretta@epa.gov)>  
**Cc:** Joel Dreessen -MDE- <[joel.dreessen@maryland.gov](mailto:joel.dreessen@maryland.gov)>; Michael Woodman -MDE- <[michael.woodman@maryland.gov](mailto:michael.woodman@maryland.gov)>  
**Subject:** Fwd: Exception Event

Kia/Lori-

We were checking with CASTNET about how to handle their sites in our EE Demo and their response is below. If they flag the data at our request is that sufficient for those sites to be included? Is it possible for CAMD to send a letter to us that says they concur with our EE Demo and then we include that as an appendix or something else along those lines?

Thanks,  
Dave

----- Forwarded message -----

**From:** Sharac, Timothy <[Sharac.Timothy@epa.gov](mailto:Sharac.Timothy@epa.gov)>  
**Date:** Wed, May 3, 2017 at 4:03 PM  
**Subject:** RE: Exception Event  
**To:** "[david.krask@maryland.gov](mailto:david.krask@maryland.gov)" <[david.krask@maryland.gov](mailto:david.krask@maryland.gov)>  
**Cc:** "Puchalski, Melissa" <[Puchalski.Melissa@epa.gov](mailto:Puchalski.Melissa@epa.gov)>

Hi Dave,

CAMD cannot perform exceptional event demonstrations, but we can flag these data in AQS for you – we have done this for CASTNET sites in other states in the past. Who did you speak with in Region 3?

For us to flag the data in AQS - simply send us a letter stating which monitors were affected, why type of EE is causing the effect, and the date/times of the ambient measurements that have been effected. See the attached letter from Colorado for an example of what I'm talking about.

Thanks,

Tim

**From:** David Krask -MDE- [mailto:[david.krask@maryland.gov](mailto:david.krask@maryland.gov)]

**Sent:** Wednesday, May 03, 2017 2:50 PM

**To:** Sharac, Timothy <[Sharac.Timothy@epa.gov](mailto:Sharac.Timothy@epa.gov)>; Puchalski, Melissa <[Puchalski.Melissa@epa.gov](mailto:Puchalski.Melissa@epa.gov)>

**Subject:** Exception Event

Hi Tim/Melissa-

We are submitting an Exceptional Event request to EPA for the Fort McMurray fire impact in Maryland on May 25 & 26, 2016 (see attached). We submitted a draft to EPA Region III for review and they commented that MDE can't include the CASTNET sites since we aren't the PQAO (see attached table).

I'm not sure how all this works, but we still want to have those sites excluded because it has the potential to impact our designation status. Would you all be willing to submit something (or at least concur if that is allowable) that support our request? We are following up with Region III to see if they know how to go about this. Have you submitted any EE requests for other sites?

We are revising our draft to incorporate their comments, but the package is due by May 31, so we have to figure out how to handle the CASTNET sites pretty quick.

Cheers,

Dave

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David J. Krask, Program Manager  
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[Click here](#) to complete a three question customer experience survey.

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